

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

GINA CRISCIONE, et al.) CASE NO. 1:24-cv-01446
)
Plaintiffs) JUDGE PAMELA A. BARKER
)
vs.) <u>DEFENDANTS EAST PARK</u>
) <u>RETIREMENT COMMUNITY, INC.</u>
) <u>AKA EAST PARK CARE CENTER,</u>
) <u>LAURA DIVINCENZO AND SARA</u>
Defendants) <u>THURMER' MOTION FOR</u>
) <u>EXTENSION OF TIME</u>

Defendants East Park Retirement Community, Inc. aka East Park Care Center, Laura DiVincenzo and Sara Thurmer respectfully move for a 14-day extension of time (until January 9, 2025) to move or plead. Although this case has been pending since August 23, 2024, Defendants were only recently served. This case has a complex and lengthy history including two prior filings in the Cuyahoga County Court of Common Pleas. A number of the claims asserted against these Defendants were previously dismissed by the common pleas court. Additionally, the Complaint includes 183 separate paragraphs and 18 causes of action. In light of the complexity of this case and the undersigned's work-load and other obligations related to the holidays and year-end, the undersigned counsel respectfully requests that the Court grant a 14-day extension of time (until January 9, 2025) for Defendants to move or plead. This Motion is not opposed by Plaintiffs' counsel who agreed, by e-mail, to consent to an extension of time until January 9, 2025.

Respectfully submitted,

/s/Emily R. Yoder

Michael Ockerman (0053403)
Emily R. Yoder (0084013)
HANNA, CAMPBELL & POWELL, LLP
3737 Embassy Parkway, Suite 100
Akron OH 44333
(330) 670-7338 (T) * (330) 670-7462 (FAX)
(330) 670-7612 (T) * (330) 670-7453 (FAX)
mockerman@hcplaw.net
eyoder@hcplaw.net

Attorney for Defendants

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing ***Motion for Extension of Time*** was filed electronically on December 17, 2024, with the Clerk using the CM/ECF system, which will notify all parties. Parties may access this document through the court's electronic-filing system.

/s/ Emily R. Yoder

Emily R. Yoder (0084013)
Attorney for Defendants
Defendants East Park Retirement Community, Inc.
aka East Park Care Center, Laura DiVincenzo and
Sara Thurmer

<<HCP #1373039-v1>>